

ORIGINAL

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2015 DEC 29 PM 2:45

DEPUTY CLERK A

UNITED STATES OF AMERICA

v.

PHANUEL MAKONI (1)

No. 3:15-CR-0479-L

Supersedes indictment

returned October 21, 2015

INFORMATION

The United States Attorney charges:

INTRODUCTION

1. At all times material to this information, defendant, Phanuel Makoni (Makoni), was a citizen of Zimbabwe and a resident of Richardson, Northern District of Texas.

The Scheme and Artifice

2. From on or about January 20, 2015 to on or about at least March 4, 2015, Makoni, and others known and unknown to the United States Attorney, devised and intended to devise a scheme to defraud the Internal Revenue Service of the Department of Treasury, and to obtain money by means of materially false and fraudulent pretenses, representations and promises.

Manner and Means

It was part of the scheme that Makoni would:

3. Unlawfully obtain personal identity information of United States taxpayers, including, names, addresses, Social Security account numbers, and other information.
4. Using the stolen taxpayer personal identification information, cause to be electronically filed with the IRS bogus 2014 individual tax returns, falsely claiming tax refunds.
5. Open bank and debit card accounts to receive the fraudulent tax refunds

Count One
Wire Fraud
(Violation of 18 U.S.C. § 1343)

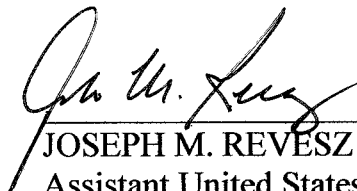
The United States Attorney hereby incorporates by reference the allegations set forth of the Introduction to this Information as if fully set forth.

On or about February 24, 2015, in the Dallas Division of the Northern District of Texas, the defendant, **Phanuel Makoni**, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce, from Texas to North Carolina, signals and sounds comprising an electronically filed bogus income tax return form 1040, in the name of taxpayer "C.G.", requesting a refund of \$4,547.00.

In violation of 18 U.S.C. § 1343.

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY



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